

Appendix G
Answers to Possible Questions regarding Completeness and Compliance

1, *Please provide how soil will be salvaged, which soil units and to what depth. ARM 17.24.115(1)(b)*

Reply: No soil will be salvaged. In the rock-collection areas there will be no heavy vehicle or equipment traffic. When mining is finished in a given area, the land will be graded as necessary to restore to contour. Then the surface will be scarified and seeded with the reclamation mixture. All heavy truck traffic will be on existing ranch roads in Sites 1 through 5. Those roads are to remain unchanged after completion of mining.

2. *Please address in the reclamation plan how waste rock generated from the operation will be reclaimed. ARM 17.24.115(1)(I)*

Rock will be palleted for shipment. No cutting, splitting, or other processing will be performed at the mining sites (Sites 1 through 5). There will be little or no waste rock. Quarried rock that is not suitable for sale as decorative rock will be used on-site by the landowners, for example as fill, or will be hauled off and sold for use as aggregate, clean fill, or other use.

3. *Will any of the ridge lines be mined so as to create a highwall? 82-4-336(9), MCA*

As detailed in the Operating Plan section, only surface rock-picking will be performed on the five mining sites. The maximum depth (i.e., the maximum thickness of the surface rocks that will be harvested) will be about ten inches. There will be no pit or highwall produced. No crushing or blasting will be done at the site.

4. *Please address the following Compliance Checklist (82-4-336) noting where the item is found in the operating and reclamation plan or application for an amendment:*

1. *The Reclamation Plan will provide for reclamation that is conducted simultaneously with the operation and initiated promptly after completion or abandonment of the operation on those portions of the complex that will not be subject to further disturbance. 82-4-336(2), MCA*
2. *The Reclamation Plan will provide for the completion of reclamation within two years of completion or abandonment of the operation on that portion of the complex. DEQ may, by order, provide a longer period. 82-4-336(3), MCA*

The Reclamation Plan states (IV.5.):

Operator will

- Keep reclamation as concurrent with quarrying operations as possible.
- Grade, scarify, and seed or plant an area no longer needed for quarrying activities within one year of the cessation of such activities on that area.

5. *The Reclamation Plan will avoid accumulation of stagnant water in the development area to the extent that it would serve as a host or breeding ground for mosquitos or other disease-bearing or noxious insect life. 82-4-336(5), MCA*

The Operating Plan states (III.5): Accumulation of stagnant water to the extent that it would serve as a host or breeding ground for mosquitos or other disease-bearing or noxious insect life in the mining area will be prevented.

6. *The Reclamation plan will provide that all final grading be made with nonnoxious, non-flammable, noncombustible solids unless approval has been granted by the department for a supervised sanitary fill. 82-4-336(6), MCA*

The Reclamation Plan states (IV.2.): The maximum depth of disturbance will be a foot or less. Where needed, the disturbed ground will be restored to grade. Only local soil will be used. (Given the small amount of surface disturbance, there is no reason to import any fill material of any kind.) The ground will then be scarified and planted with the vegetation mix listed in Table 3 or an alternate mixture specified by the landowner and approved by DEQ.

7. *When mining has left an open pit exceeding 2 acres of surface area and the composition of the floor or walls of the pit are likely to cause formation of acid, toxic, or otherwise pollutive solutions ("objectionable effluents") on exposure to moisture, the Reclamation Plan will adequately provide for:*

(a) *The insulation of all faces from moisture or water contact by covering the faces with material or fill not susceptible itself to generation of objectionable effluents in order to mitigate the generation of objectionable effluents;*

(b) *The processing of any objectionable effluents in the pit before they are allowed to flow or be pumped out of the pit to reduce toxic or other objectionable ratios to a level considered safe to humans and the environment by the department;*

(c) *The drainage of any objectionable effluents to settling or treatment basins when the objectionable effluents must be reduced to levels considered safe by the department before release from the settling basin; or*

(d) *The absorption or evaporation of objectionable effluents in the open pit itself; and*

(e) *The prevention of entrance into the open pit by persons or livestock lawfully upon adjacent lands by fencing, warning signs, and other devices that may reasonably be required by the department.*

82-4-336(7), MCA

There will be no open pit of any kind, as stated in the Operating and Reclamation Plans. (See IV.1.)

There will also be no acidic, noxious, or toxic effluents. (II.9.)

8. *The Reclamation Plan will provide for vegetative cover (if it is appropriate to future use of the land) and meets county standards for noxious weed control. 82-4-336(8), MCA*

See IV.2, Table 3, and III.7.

9. *With regard to disturbed land other than open pits and rock faces, the Reclamation Plan will reclaim all disturbed land to comparable utility and stability as that of adjacent areas. This standard may not be applied to require the removal of mine-related facilities that are valuable for postmining use. If mine-related facilities are not to be removed or the disturbed land associated with the facilities are not to be reclaimed, it must be to facilitate a postmine use that has been approved by the department. 82-4-336(9), MCA*

See IV.1. The land on Sites 1 through 5 will continue to be used as pasture after reclamation. Site 6 will continue to be used as an industrial site, except that it may be converted to a residential “horse property” if there is a market for it.

10. *With regard to open pits and rock faces, the Reclamation Plan will reclaim the open pits and rock faces to a condition:*

- (a) Of stability structurally competent to withstand geologic and climatic conditions without significant failure that would be a threat to public safety and the environment;*
- (b) That affords some utility to humans and the environment;*
- (c) That mitigates postreclamation visual contrasts between reclamation lands and adjacent lands; and*
- (d) That mitigates or prevents undesirable offsite environmental impacts.*

See III.1. and IV.1. There will be no highwalls, no open pits, and no rock faces created by mining.

11. *The Reclamation Plan will ensure public safety and prevents the pollution of air or water and the degradation of adjacent lands. 82-4-336(10) MCA*

See III.5. and III.6. Also see Part I. Air and water pollution will be prevented. All rock collection will be kept at least 1000 ft from any residences. There is nothing in a rock harvesting operation of this kind that would lead to the degradation of adjacent lands.

12. *The Reclamation Plan will provide for permanent landscaping and contouring to minimize the amount of precipitation that infiltrates into disturbed areas that are to be graded, covered, or vegetated, including but not limited to tailings impoundments and waste rock dumps. 82-4-336(12) MCA*

There will be no tailings impoundments, waste rock dumps, or other potential sources of toxic drainage. Under these conditions, it would be undesirable to tamper with the current natural infiltration and recharge of the local aquifer. The mining areas will be reclaimed as pasture. The main change after mining and reclamation would be fewer surface rocks and possibly an improved growth of pasture grasses and forbs.

13. *The Reclamation Plan will prevent objectionable postmining ground water discharges. 82-4-336(12) MCA*

The groundwater quality is not expected to be affected in any way by the removal of surface rock. No effect on local springs is foreseen. As stated in II.4., no mining will be conducted within 100 ft of any spring. Furthermore no excavations deeper than one foot will be created (III.1.). The surface rock is sandstone of the Kootenai Formation. This rock is inert, is not acid generating, and produces no noxious, toxic, or harmful effluent (II.9., and III.1.).

Thus neither the quantity nor the quality of groundwater discharges will be affected, and no objectionable groundwater discharges will result from mining and reclamation.